

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

DRAFT

Conditional Major, Construction / Operating

Permit: F-08-016

Gator Made, Inc.

Somerset, KY 42503

May 1, 2008

Frough Q. Sherwani, Reviewer

SOURCE ID: 21-199-00094

AGENCY INTEREST: 39760

ACTIVITY: APE20080001

SOURCE DESCRIPTION:

Gator Made, Inc. is a specialty company, which manufactures trailers in Somerset, Kentucky. Processes include a paint booth for spray coating of metal parts and welding operation.

The source is currently regulated under 401 KAR 52:080, but due to a fire at their operation current location, they are moving to a new larger location which might allow for expansion in the future.

COMMENTS:

On April 16, 2008, the Division received an application from the source for the initial condition major permit.

TYPE OF CONTROL AND EFFICIENCY:

The spray paint booth will use panel filters with a control efficiency of 90% to control particulate matter emissions associated with the spray paint booth. Also, a 75% transfer efficiency will be assumed for the spray painting operations.

EMISSION FACTORS AND THEIR SOURCE:

AP -42 5th edition, and mass balance are used for the emission factors for PM, VOC and HAPS.

APPLICABLE REGULATIONS:

401 KAR 52:030. Federally enforceable permits for non-major sources.;

401 KAR 59:010, New process operations.

PRECLUDED REGULATIONS:

40CFR 63 Subpart MMMM- National Emission Standard for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, because the permittee has taken limits on annual individual HAP and combined HAPs emissions avoid triggering major source thresholds. The actual HAP/HAP's emission shall be calculated based on 12-month rolling total.

40 CFR 63, Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources does apply to this facility since it does not use coatings that contain the target HAP identified in the regulation.

401 KAR 59:225 Miscellaneous metal parts coating, does not apply because the permittee has taken limits on VOC emissions to avoid triggering major source thresholds, and the source is located in an attainment county for ozone. The actual VOC emission shall be calculated based on 12-month rolling total.

EMISSION AND OPERATING CAPS DESCRIPTION:

- a. The source has accepted a facility-wide cap on annual VOC emissions of no more than 50.0 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
- b. The source has accepted a facility-wide cap on annual individual HAP emission of no more than 9.0 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
- c. The source has accepted a facility-wide cap on annual combined HAPS emissions of no more than 22.5 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
- d. The permittee shall not cause, suffer, allow, or permit any continuous emission into the open air from a control device or stack associated with any affected facility (s) which is equal to or greater than twenty (20) percent opacity.
- e. For emission from a control device or stack, no person shall cause, suffer, allow or permit the emission in to the open air of particulate matter (PM) from any affected facility which in excess of 2.34 lb/hr.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.